

July 10, 2015

Ms. Vikki Wachino
Director
Centers for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Re: Iowa Health and Wellness Plan: NEMT Waiver Amendment

Dear Ms. Wachino:

The undersigned organizations appreciate the opportunity to comment on the proposed non-emergency medical transportation (NEMT) waiver for the Iowa Health and Wellness Plan (IHAWP). Although we support Iowa's bipartisan decision to accept federal Medicaid funding to extend coverage to low-income parents, children and other adults we have substantial concerns regarding Iowa's request for a 17-month extension of the existing waiver of the NEMT requirement.

The survey data from the University of Iowa Public Policy Center (PPC) found:

- 15% of Wellness Plan (WP) members and 5% of Marketplace Choice (MPC) members needed transportation to or from a health care visit but could not get it in the past 6 months.
- 25% of WP members and 11% of MPC members usually or always needed assistance from other sources to get to or from their health care visit.
- 14% of WP members and 6% of MPC members worried "a lot" about transportation costs.

Through this survey analysis, the state found that there are significant differences between Wellness Plan Members who lack NEMT and traditional Medicaid beneficiaries that receive the benefit. This is contrary to the original rationale for waiving the benefit over one year ago which was that "Wellness Plan members without a non-emergency transportation benefit will have equal or lower barriers to care resulting from lack of transportation". All of the evidence collected thus far indicates that Wellness Plan members have an even greater barrier to care because they lack NEMT.

Furthermore, the survey shows the need for transportation benefits for Marketplace Choice (MPC) members as well. Even if the need in MPC plans is lower than traditional Medicaid, there is no evidence that the state is doing anything that **results** in transportation being a lower barrier to care. State efforts, for example, to extend office hours has not eliminated the need for NEMT. If transportation were provided to MPC members, it could meet the needs of beneficiaries who have reported struggling to get transportation to their appointments.

The Community Transportation Association of America
Children's Health Fund
Health Outreach Partners
The National Association of Community Health Centers